

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LYNN M. DOOLEY,)	
)	
Plaintiff,)	
)	Case No. 08 C 1192
v.)	
)	Judge Amy J. St. Eve
EVANSTON NORTHWESTERN)	
HEALTHCARE CORPORATION, an Illinois)	Magistrate Judge Nolan
Corporation, and SUSAN R. BESAW, an)	
individual,)	
)	
Defendants.)	
)	

**AGREED MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND**

Defendants, Evanston Northwestern Healthcare Corporation and Susan R. Besaw (“Defendants”), by their attorneys Seyfarth Shaw LLP and by agreement of the parties, moves this Court for leave to file an answer or otherwise respond to Plaintiff’s First Amended Complaint in this matter on or before April 7, 2008. In support of this motion, Defendants state as follows:

1. Plaintiff filed her Complaint on February 27, 2008. Defendants were served on February 28, 2008.
2. Plaintiff filed her First Amended Complaint on March 3, 2008.
3. Defendants need additional time to investigate the facts and research the law in order to respond to Plaintiff’s First Amended Complaint.
4. Therefore, Defendants request up to and including April 7, 2008, to answer Plaintiff’s First Amended Complaint or otherwise respond.

5. On March 19, 2008, Defendants' counsel spoke to Michael Merrick, Plaintiff's counsel, regarding the substance of this motion, and Mr. Merrick agreed to Defendants' request for an extension of time to answer Plaintiff's First Amended Complaint or otherwise respond.

6. This motion is made in good faith and is not being filed for the purpose of causing delay. This is Defendants' first request for an extension of time in this action.

WHEREFORE, Defendants respectfully request that the Court grant Defendants up to and including April 7, 2008, to answer or otherwise respond to Plaintiff's First Amended Complaint.

DATED: March 19, 2008

Respectfully submitted,

EVANSTON NORTHWESTERN
HEALTHCARE CORPORATION, ET. AL.

By /s/ Meagan C. LeGear
One of Its Attorneys

Ronald L. Lipinski
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CERTIFICATE OF SERVICE

I, Meagan C. LeGear, an attorney, do hereby certify that on this 19th day of March, 2008, I electronically submitted the foregoing AGREED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Michael J. Merrick
Merrick Law Firm, LLC
150 North Michigan Ave., Suite 2700
Chicago, Illinois 60601

_____/s/ Meagan C. LeGear